

McBREEN & KOPKO  
Kenneth A. Reynolds, Esq. (KR3808)  
Attorneys for Debtor  
and Debtor-in-Possession  
500 North Broadway, Suite 129  
Jericho, New York 11753  
Tel.: (516) 364-1095  
Fax: 516-364-0612  
11-3540090

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK**

-----X

In re:

Ridge Blvd. Realty, Ltd.,

Chapter 11

Case No.: 10-43380 (JF)

Debtor.

-----X

**APPLICATION FOR RETENTION OF SPECIAL COUNSEL FOR DEBTOR**

**TO: THE HONORABLE JEROME FELLER  
UNITED STATES BANKRUPTCY JUDGE:**

The application of Ridge Blvd. Realty, Ltd., the debtor and debtor-in-possession herein (the "Debtor"), respectfully alleges:

1. On April 20, 2010 (the "Filing Date"), the Debtor filed a voluntary petition (the "Petition"), for relief under Chapter 11 of Title 11 of the Bankruptcy Code, in the United States Bankruptcy Court for the Eastern District of New York, Brooklyn Division.
2. The first meeting of Creditors was scheduled for and took place on May 24, 2010.
3. The Debtor continues to operate its business, affairs and manages its assets as a debtor-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.
4. An Official Committee of Unsecured Creditors has not been appointed in this case.

5. This Application is submitted, pursuant to 11 U.S.C. Section 327(e), Rule 2014 of the Federal Rules of Bankruptcy Procedure, and Rule 2014-1 of the Local Rules of the United States Bankruptcy Court for the Eastern District of New York, in support of the annexed pre-fixed proposed order authorizing Applicant to employ the law firm of Ganfer & Shore, LLP (“Ganfer”), nunc pro tunc to April 20, 2010, to represent the Debtor as special counsel in the above-captioned Chapter 11 case.

6. The Debtor has selected Ganfer for the reason that it would like to continue to utilize its litigation services in connection with an action commenced in the King’s County Supreme Court entitled “Ridge Blvd. Realty, Ltd., Carmine Gargano and Rosa Gargano v. Chrisanthy Zisimopoulos, Steven Gambino, Steven Gambino Architects, P.C., Samik Mako, Michele Mako, Markos Kypriotis, Urania Kypriotis, JGN Construction Management, LLC, JGN Construction Corp.”, Index Number 33178/2003 (the “Supreme Court Action”).

7. Ganfer has served as Debtor’s litigation counsel in connection with the Supreme Court Action seeking punitive damages and charges against the Defendants caused by the demolition, excavation, and construction of houses of the Defendant on the property immediately adjacent to Debtor’s property. Damages from Plaintiffs’ causes of action sounding in trespass, nuisance, fraud, permanent injunction, property damage, depreciation in value of property and punitive damages.

8. The terms of the employment of Ganfer, agreed to by the Debtor, and subject to the approval of the Court is at the rate of \$350.00 per hour.

9. Ganfer received a pre-petition retainer from the Debtor’s in the aggregate amount of \$20,000.00.

10. To the best of Applicant’s knowledge, information and belief, Ganfer represents

no interest adverse to the Debtor or the estate and has no other connection to the Debtor except to the extent Ganfer has represented the Debtor pre-petition with respect to the subject Supreme Court Action.

11. To the best of Applicant's knowledge, information and belief, Ganfer has no connection with the Debtor, its creditors, or any other parties in interest, or its respective attorneys and accountants, except as otherwise set forth herein and in the accompanying Affidavit of Gabriel Levinson, Esq.

12. No previous application for the relief sought herein has been sought by Applicant or granted by this or any other Court.

**WHEREFORE**, Applicant respectfully requests that they be authorized to employ the law firm of Ganfer & Shore, LLP as special counsel concerning the prosecution of the Supreme Court Action, and that it be granted such other and further relief as this Court deems just and proper.

Dated: Jericho, New York  
April 20, 2011

RIDGE BLVD. REALTY, LTD.  
Debtor and Debtor-in-Possession

By: /s/ Rosa Gargano  
Rosa Gargano